

# Exhibit J

**From:** Strang, Lindsey <lstrang@axinn.com>  
**Sent:** Wednesday, August 10, 2022 9:58 AM  
**To:** Wheeler, Travis  
**Cc:** sgant@bsfllp.com; charrison@bsfllp.com; sjones@bsfllp.com; mmitchell@bsfllp.com; batherton@bsfllp.com; kmoat@bsfllp.com; desau@carltonfields.com; kgore@carltonfields.com; aholman@carltonfields.com; rkobert@carltonfields.com; smenger@carltonfields.com; ksadlo@carltonfields.com; gyearick@carltonfields.com; rcoffman@coffmanlawfirm.com; bfox@kaplanfox.com; RKaplan@kaplanfox.com; mmccahill@kaplanfox.com; mmoonsammy@kaplanfox.com; juris@kaplanfox.com; tyagman@kaplanfox.com; elifvendahl@lgcounsel.com; csullivan@lgcounsel.com; nlacourt@lgcounsel.com; Cain-Mannix@marcus-shapira.com; marcus@marcus-shapira.com; Hill@marcus-shapira.com; Eddy, David C.; Keibler, Chase; Lynch, Dennis J.; Steele, Connie M.; Surratt, Gina Y.; Wheeler, Travis; Ricard, Rhett D.; wblechman@knpa.com; srandall@knpa.com; mponzoli@knpa.com; dpatton@knpa.com; dgermaine@sperling-law.com; arodriguez@sperling-law.com; jbergman@sperling-law.com; mamaro@sperling-law.com; pcramer@srvhlaw.com; clopez@srvhlaw.com; jack.stern@cwt.com; mark.singer@cwt.com; Philip.iovieno@cwt.com; nicholas.gravante@cwt.com; gillian.burns@cwt.com; elizabeth.moore@cwt.com; christopher.wilson@bakerbotts.com; william.lavery@bakerbotts.com; danielle.morello@bakerbotts.com; wyatt.carlock@bakerbotts.com; Taylor, Jarod G.; Rider, Tiffany; Oppenheimer, Brooke J.; Lu, Victoria J.; Holleran, Keith J.  
**Subject:** Pork - DAP Structured Data Request  
**Attachments:** 2021 0331 Tyson Letter to Class Pls & PR re Pork Products.pdf; 2022 0202 J Taylor ltr to M Mitchell re MDL DAPs RFPs.pdf

{EXTERNAL EMAIL}

Counsel:

We write in response to Travis Wheeler's May 31, 2022 letter regarding Defendants' sales data production to correct an apparent misunderstanding. The letter states that DAPs understand that Tyson produced structured sales data for all of its pork products without exclusions. This is incorrect. Pursuant to the agreement of the then parties to this litigation, and as detailed in the attached letter to Class Plaintiffs from Lindsey Strang dated March 31, 2021, Tyson endeavored to produce sales data only for certain agreed upon "Pork Products," and endeavored to exclude sales data for "Non-Pork Products" as defined in the same letter. This is consistent with the description of data systems separately outlined in the attached February 2, 2022 letter from Jarod Taylor to DAPs.

Tyson has undertaken substantial effort at considerable expense to identify and produce sales data from multiple legacy data systems and does not intend to restart that process to satisfy DAPs' untimely request for additional data.

Thanks,

**Lindsey Strang**  
*Associate*



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